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Counsel to Plaintiff Runway Liquidation, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RUNWAY LIQUIDATION HOLDINGS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 17-10466 (SCC)

(Jointly Administered)

RUNWAY LIQUIDATION, LLC,

Plaintiff,

Adv. Proc. No. 19-01058 (SCC)

v.

QUBIT INC.,

Defendant.

STIPULATION FURTHER EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, Runway Liquidation, LLC (“Plaintiff”) and defendant, Qubit Inc.

(“Defendant”), by and through their undersigned attorneys, hereby stipulate and agree as follows:

¹ A list of the Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number include: Runway Liquidation Holdings, LLC (6857); Runway Liquidation, LLC (5942); Runway Liquidation Intermediate Holdings, LLC (3673); MR Liquidation, LLC (9200); and MMH Liquidation, LLC (3854).

WHEREAS, on February 26, 2019, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the “Summons”) was issued on February 27, 2019; and

WHEREAS, on March 8, 2019, Defendant was served with the Summons and Complaint;

WHEREAS, the parties previously entered into a stipulation to further extend the deadline for Defendant to answer the Complaint through June 26, 2019 [Docket No.7]; and

WHEREAS, the parties are currently negotiating in good faith to settle this adversary proceeding.

The parties hereby stipulate and agree to the matters set forth below:

1. The time by which Defendant is required to answer the Complaint is further extended through and including July 17, 2019.

Dated: June 26, 2019

Dated: June 25, 2019

PACHULSKI STANG ZIEHL & JONES LLP
Counsel to Plaintiff, Runway Liquidation, LLC

MARKSDiPALERMO PLLC
Counsel for Qubit Inc.

By: /s/ Beth E. Levine
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